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May 7, 1998

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MAY - 7 1998

**EX PARTE PRESENTATION**

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Federal Communications Commission  
Office of Secretary

Re: *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121*

Dear Ms. Salas:

Attached is SBC Communications Inc.'s (SBC's) April 1998 report describing its success in opening its local markets and meeting its obligations under the Telecommunications Act of 1996. Please associate the report with the above-referenced docket.

In accordance with the Commission's rules governing ex parte presentations, an original and two copies are provided herewith. Please contact me should you have any questions concerning the foregoing.

Respectfully submitted,

*Todd F. Silbergeld*

**Attachment**

cc: Mr. Thomas Power  
Mr. James Casserly  
Mr. Kevin Martin  
Mr. Paul Gallant  
Mr. Kyle Dixon  
Mr. Richard Metzger  
Mr. Richard Welch  
Ms. Carol Matthey  
Ms. Melissa Newman  
Mr. Michael Pryor  
Ms. Audrey Wright

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MAY - 7 1998

**SBC'S SUCCESS IN OPENING ITS LOCAL MARKETS: SIGNIFICANT  
LOCAL COMPETITION EXISTS AND IS GROWING**Federal Communications Commission  
Office of Secretary**April 1998 Report**

SBC (Southwestern Bell Telephone, Pacific Bell and Nevada Bell) has dedicated significant resources and investment to open its markets to local competition and to comply with all requirements contained in the 1996 Telecommunications Act. As described in detail below, SBC has made available products, services and systems required by Section 251 and the competitive checklist of the 1996 Act, and competitive local exchange carriers ("CLECs") have ordered and are actually using these checklist services and products to provide local service in all seven SBC states.

These indicators provide irrefutable evidence that new entrants are obtaining the network elements that they need from SBC to provide local service, that they are providing such exchange services to end users and that their ability to enter the market is unambiguous. Taken together, these data demonstrate that entry requirements into the local market in SBC's states have been eliminated, that competitive entry is occurring and that SBC has lost approximately **903,000** lines to CLECs in SBC's states. Of these lines lost, approximately 600,000 were resale lines and 304,000 lines were captured by facilities-based carriers. As a result of SBC's compliance efforts, CLECs now have everything they need to compete against SBC and can use resale, interconnection or unbundled network elements to compete for and take SBC customers.

**SBC's Capital and Expense Investments To Open Its Markets**

- Since the passage of the 1996 Act on February 6, 1996, SBC has devoted significant financial, technical and personnel resources to implement the market- and network-opening requirements of Sections 251 and 252 of the Act. SBC has spent more than \$1 billion and devoted more than 3,300 employees to implement the Act and open its local markets to competition— including but not limited to equipment, computer hardware, software and manpower. By the end of 1998, SBC estimates that it will have spent a total of \$1.5 billion making certain it meets the requirements of the Act.

**Interconnection Agreements**

- **Signed Agreements:** SBC and CLECs have signed more than 290 interconnection and resale agreements within SBC's seven-state service area. In addition, 454 CLECs have received PUC approved certificates to provide local service in SBC states.
- **PUC Approved Agreements:** The various state commissions have approved 220 SBC-CLEC interconnection and resale agreements. These approved agreements give the CLECs everything they say they need to provide local services and compete against SBC. There are a large number of PUC approved agreements in each of SBC's states: Texas: 89; California: 27; Kansas: 25; Arkansas: 24; Oklahoma: 19; Missouri: 23 and Nevada: 13 approved agreements.
- **Current Negotiations:** SBC currently is in the process of negotiating more than 400 additional interconnection and resale agreements.

### CLECs Competing Against SBC

- As of the end of March 1998, more than 175 CLECs were operational in SBC's territory and passing resale, interconnection or UNE orders to SBC. Ninety five CLECs were passing orders in Texas alone.

### SBC Access Lines Lost to CLECs

- Through the end of March 1998, approximately **903,000** access lines have been lost to CLECs through resale or through the establishment of new facilities-based service by CLECs in SBC's seven-state service area. Approximately 600,000 SBC lines have been resold by CLECs and approximately 304,000 additional customers are being served on a facilities-basis (as indicated by CLEC E-911 listings) by CLECs in SBC's territory.

The approximate number of lines lost to CLECs in SBC's 7 states on a resale and facilities-basis is:

	<u>Resale Total</u>	<u>Resale Residential</u>	<u>Resale Business</u>	<u>Resale Priv. Coin</u>	<u>Facilities- Based Lines</u>
a) California:	256,000	139,000	109,000	7,500	274,900
b) Texas:	257,000	193,000	53,000	10,100	13,900
c) Kansas:	40,000	19,400	20,600	0	1,100
d) Oklahoma:	16,000	13,400	2,700	13	11,900
e) Arkansas:	13,400	12,100	1,300	0	1,400
f) Missouri	13,500	7,700	5,800	0	1,600
g) Nevada	1,800	360	1,400	0	N/A
<b>RESOLD LINES:</b>	<b>599,000</b>	<b>375,300</b>	<b>182,700</b>	<b>18,300</b>	

**FACIL.-BASED  
LINES LOST:**

**303,900**

**SBC TOTAL**

**LINES LOST: 902,900**

- There can be no dispute that resale of local service is available and significant in SBC's territory. SBC has demonstrated that it has made resale available and its OSS can process CLEC resale orders in an accurate and timely manner without any backlogs. Resale activity slowed in March, 1998 (approximately 27,000 lines lost), and this situation was primarily the result of decisions by AT&T and MCI to de-emphasize their resale activities, principally in California. For example, residential resale by CLECs in California in March 1998 was significantly lower than for each of the last six months of 1997. Nevertheless, even if the major IXCs chose for their own internal business and regulatory reasons not to take advantage of the resale option made available to them by SBC because they do not like the resale pricing decisions made by the PUCs, there can be no dispute that SBC has met its obligations under the Act to make resale available to competitors. The figures listed above

demonstrate that SBC has made available to CLECs all the systems and services they need to compete on a resale basis in each of SBC's states.

#### FACILITIES-BASED COMPETITION STATUS:

The following figures demonstrate that SBC has opened its local markets to competition and that in addition to making resale available to competitors, SBC is also providing CLECs with the facilities and network elements they need from SBC in order to compete on a facilities-basis in the local exchange market. Information is not available to SBC to identify with precision the full extent of facilities-based competition in each of its states. Available indicators underestimate the extent of facilities-based competition and are imperfect measures of competitive entry because each captures only that part of entry that requires action by SBC and does not capture the extent of facilities-based self-supply being undertaken by CLECs. Nevertheless, a review of available indicators (e.g. CLEC E-911 listings and numbers ported) demonstrate that there is significant and growing facilities-based competition in SBC's states and that approximately **304,000** lines are being served on a facilities-basis by CLECs in SBC's states.

- SBC is making available to CLECs through 220 PUC-approved interconnection agreements and its new and modified systems and networks, all products, services and systems that CLECs need to provide facilities-based or UNE-based local service to residential and business customers.

#### CLEC E-911 Numbers—Best Indicator of Facilities-Based Competition

- CLEC listings in the E-911 database is the best available indicator of access lines being served on a facilities basis by facilities-based carriers. These listings show that CLECs serve approximately 304,000 lines in SBC's 7 states on a facilities basis. CLECs have requested E-911 service for 304,000 lines from their own NXX Codes that were assigned to them to provide facilities-based service.
- In California alone, 14 facilities-based carriers serve approximately 274,000 lines on a facilities basis (based on E-911 listings). CLEC E-911 listings indicate that there is at least the following number of lines being served on a facilities-basis in the other SBC states: Texas: 13,944; Oklahoma: 11,901; Missouri: 1,659; Arkansas: 1,400; and Kansas: 1,111 facilities-based lines.

#### Numbers Ported—Second Indicator of Facilities-Based Competition

- More than 57,200 existing SBC lines have been ported via interim number portability to facilities-based competitors in each of SBC's seven states. CLECs have chosen to port mostly business lines, but the same basic processes and procedures can be used to port residential lines. This is one indicator of facilities-based competition that has occurred in SBC's seven states, but it underestimates the actual amount of facilities-based competition that has occurred. Each of the numbers ported represents conversion of an existing line from SBC to a facilities-based CLEC provider. It should be noted, however, that lines do not have to be ported when CLECs serve new lines/customers on a facilities-basis and that SBC has no precise method for determining exactly how many additional lines or customers are being served by facilities-based providers in its seven states.

#### UNEs, Interconnection and Other Facilities-Based Products Provided By SBC to CLECs

- Interconnection Trunks: SBC's provisioning of local interconnection trunks is an indicator that actual local exchange traffic is being exchanged between CLECs and SBC. SBC has provisioned approximately 260,000 one-and two-way interconnection trunks to CLECs in SBC's seven-state service area. These trunks allow CLECs to connect their networks and customers to SWBT's network. 162,000 of these trunks were provisioned in California and 95,000 interconnection trunks were provided to CLECs in the SWBT five-state region.
- Unbundled Loops: Unbundled loops are the direct connection between the local network and customer's premises. CLECs can provision loops themselves, or they can lease unbundled loops from SBC or other suppliers. Because CLECs can self-provision loops, the number of unbundled loops provided by SBC understates the extent of existing facilities-based competition. Nevertheless, approximately 42,000 unbundled loops have been provisioned by SBC to CLECs in SBC's seven states. In addition, more than 300 unbundled switch ports have been requested by and provided to CLECs by SBC.
- CLEC Collocation Arrangements: Collocation is an important measure of competitive facilities-based presence because once a competitor is collocated in an SBC central office it has access to every loop connected to that central office. 392 physical collocation arrangements are operational in SBC's seven-state service area -- 80 of these are in SWBT's region, with 312 in California.
- 312 physical collocation arrangements (125 in SWBT and 186 in California/Nevada) are currently being worked on and pending completion.
- More than 55 virtual collocation arrangements are operational in SWBT's five-state territory.
- E-911 Trunks: CLECs have requested and SBC has provisioned 622 operational E-911 trunks to facilities-based CLECs in SBC's seven-state service area. Of this number, 426 are located in California and 190 are in SWBT states.
- DA/OS Trunks: More than 800 Directory/Operator Assistance trunks have been provisioned by SWBT to CLECs in the five SWBT states.

#### Reciprocal Compensation – Another Indicator That SBC's Networks Are Open

- Reciprocal compensation minutes of use is another indicator that demonstrates that actual local traffic is being exchanged between CLECs and SBC. A substantial amount of local traffic has been exchanged between SBC and CLECs, with most of that traffic (and the corresponding reciprocal compensation) going from SBC to the CLECs. For example, more than **3.8 billion** minutes of local traffic (excluding Internet traffic) has been exchanged between SWBT/Pacific Bell/Nevada Bell and CLECs over interconnection trunks. More than 90% of this local traffic has been exchanged from SBC to CLEC networks. It should be noted, that these minutes do not capture all local minutes being generated by CLECs because they do not include CLEC-to-CLEC traffic or on-net (i.e., intra-CLEC) traffic.
- In addition, the fact that an additional **6.3 billion** minutes of Internet traffic has been exchanged between SBC and CLEC networks also demonstrates that SBC's networks have been opened to competition. The 10 billion minutes of local and Internet minutes-of-use

exchanged between SBC and CLEC Networks confirm that SBC's networks are open to and connect with CLEC networks.

#### Telephone Numbers Requested By and Assigned to CLECs

- More than 2,058 NXX codes (each code representing 10,000 numbers) have been assigned to facilities-based CLECs in SBC's seven-state service area, with an additional 120 assignments pending. In other words, CLECs have requested and SBC has assigned 20.5 million telephone numbers to CLECs in its seven states; more than 12.1 million numbers have been requested by CLECs in California and an additional 8.4 million numbers have been requested in SWBT's five states.

#### Access to SBC White Page Directories

- CLEC information can be included in all SBC White Page directories in SBC's seven state service areas. SBC has provided more than 438,000 white page listings for CLEC customers.

#### Access to SBC Poles and Conduits

- SBC has provided competitors with access to more than 373,000 of its poles and approximately 8.1 million feet of conduit space for their use to compete against SBC in its seven states.

#### CLEC Orders Handled by SBC's OSS and Local Service Centers

- Since the 1996 Act passed, SBC's OSS and Local Service Center personnel have handled more than 1.7 million service orders from CLECs to order facilities, network elements and resold or second lines for their customers, change or add vertical services etc. More than 1.1 million orders from CLECs have been processed in the SWBT five-state region and more than 658,000 orders have been processed in California/Nevada. The fact that SWBT processed more than 730,000 orders in 1997, and an additional 334,000 orders in the first three months of 1998, without a backlog, is strong evidence that SBC has developed state-of-the-art OSS and that these systems are being used by CLECs to compete in the local market against SWBT. Orders are also being processed in California in a similar timely and accurate manner without any backlogs.
- SBC also demonstrated in Texas that its OSS (which is the same system used in all five SWBT states) could handle large increases in volumes from CLECs. Over 928,000 CLEC service orders in Texas have been processed, with over 246,000 orders processed in January through March of 1998. SBC's OSS and Local Service Centers have handled the increased volume of service orders without experiencing a backlog.

#### Conclusion

- The resale, interconnection, facilities-based and OSS-related numbers listed above, provide compelling evidence that SBC has opened each of its seven states to resale, facilities-based and UNE competition and that SBC provides CLECs with all the systems and services they need to capture SBC's local customers.
- A neutral examination of the record unequivocally confirms that SBC has complied with the 1996 Act, it has provided CLECs with access to all 14 competitive checklist items and it has opened its local markets to competition.

**SBC's Section 251 / Checklist Provisioning Status**

☒ End of Month Report  
 Data through: 3/98 (unless otherwise noted)  
 Shaded data through 2/98 (unless otherwise noted)

*Green, italicized, bolded data is corrected from previous edition.*

Date Produced 5/1/98

#	CHECKLIST DESCRIPTION	PRODUCTS PROVIDED	AR	KS	MO	OK	TX	SWBT's 5 States	CA	NV	SBC TOTAL
1	Interconnection for the transmission and routing of telephone exchange service and exchange access at any technically feasible point within the carrier's network	<b>Total Trunks Trunks Provided to CLECs</b> · One Way Trunks (SBC to CLEC) · One Way Trunks (CLEC to SBC) · Two Way Trunks <b>Physical Collocation *</b> · Operational Cages · Pending Cages <b>Virtual Collocation *</b> · Operational Arrangements · Pending Arrangements <b>Number of Collocated Wire Centers</b>	4,749 3,319 572 858 6 2 2 0 0 3	2,232 1,080 348 804 3 3 6 0 0 4	7,448 4,372 1,431 1,645 6 18 8 0 0 7	9,234 7,401 1,185 648 16 3 5 0 0 13	71,672 41,093 17,640 12,939 49 99 36 2 2 35	95,335 57,265 21,176 16,894 80 125 57 2 2 62	162,559 13,512 2,040 147,007 312 186 0 1 1 109	1,992 0 0 1,992 0 1 0 0 0 0	259,886 70,777 23,216 165,893 392 312 57 3 171
2	Nondiscriminatory access to network elements (In addition, See Items 3-6 below)	<b>Number of CLECs passing orders in 1998</b> <b>Total orders processed (2/6/96 - 3/98) **</b> · Manual · Electronic <b>Total orders processed in 1997 **</b> · Manual · Electronic <b>Total orders processed in 1998 **</b> · Manual · Electronic <b>Total orders processed in March 1998 **</b> · Manual · Electronic	12 43,357 42,662 695 19,035 19,035 0 24,322 23,627 695 6,964 6,269 695	12 66,806 46,686 20,120 41,476 28,972 12,504 25,330 17,714 7,616 9,971 6,399 3,572	16 20,489 16,854 3,635 6,396 6,309 87 14,089 10,541 3,548 8,160 4,718 3,442	12 47,337 42,501 4,836 22,832 20,408 2,424 24,501 22,089 2,412 11,062 10,112 950	95 928,812 721,048 207,764 641,098 495,077 146,021 246,110 184,367 61,743 85,250 63,481 21,769	147 1,106,801 869,751 237,050 730,837 569,801 161,036 334,352 258,338 76,014 121,407 90,979 30,428	26 658,716 100% in 1996 0% in 1996 491,327 ~ 80% ~ 20% 98,192 28,476 69,716 28,897 8,381 20,516	4 2,244 2,244 0 1,299 1,299 0 945 945 0 280 280 0	177 1,767,761 1,223,463 433,489 150,584
3	Nondiscriminatory access to poles, ducts, conduits and rights of way.	<b>Total Number of Poles Attached (Note 1)</b> <b>Total Feet of Duct Occupied (Note 1)</b>	112 107,623	22 6,149	415 64,897	186 34,761	2,445 633,803	3,180 847,233	370,060 7,236,650	508 16,225	373,748 8,100,108
4	Local loop transmission from the central office to the customer's premises, unbundled from local switching or other services	<b>Unbundled Loops</b>	326	240	811	744	255	2,376	33,873	5,729	41,978
5	Local transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services	<b>Unbundled Transport</b> · Dedicated Transport Available? · Shared Transport Available?	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes
6	Local switching unbundled from transport, local loop transmission or other services.	<b>Unbundled Switch Ports</b>	0	0	1	0	163	164	149	0	313
7	Nondiscriminatory access to 911 and E911, directory assistance, and operator call completion services.	· E911 Trunks (not included in Item 1 Total) · DA/OA Trunks (not included in Item 1 Total) *** · CLECs using Directory Assistance Service (Note 2) · CLECs using "0" Call Completion Service (Note 2) · Are CLECs offered E-911 service directly to government bodies or interconnecting with SBC's existing service arrangements? <b>Number of Facilities Based CLEC End User E-911 Listings</b> · Residence · Business **** · Total	16 64 7 7 0 1,400 1,400	16 0 11 11 0 1,111 1,111	14 78 14 14 0 1,659 1,659	18 64 9 9 99 11,802 11,901	126 594 90 89 2,937 11,007 13,944	190 800 102 102 3,036 26,979 30,015	426 0 Data Not Available Data Not Available Res/Bus Split Not Available 273,886	6 2 Data Not Available Data Not Available Data Not Available Available 0	622 802 3,036 26,979 303,901
8	White pages directory listing for customers of other carrier's telephone exchange service.	<b>Number of CLEC End User White Pages Listings (NV a/o 12/97)</b> · Resale · Facilities Based · Total	11,995 267 12,262	26,281 136 26,417	9,176 454 9,630	14,599 554 15,153	175,692 2,411 178,103	237,743 3,822 241,565	185,668 9,440 195,108	1,142 547 1,689	424,553 13,809 438,362
9	Nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service	<b>Telephone Numbers Provided to CLECs</b> · Numbers Assigned · Numbers Pending Assignment	120,000 0	70,000 0	710,000 0	330,000 0	7,170,000 60,000	8,400,000 60,000	12,150,000 740,000	30,000 0	20,580,000 800,000

**SBC's Section 251 / Checklist Provisioning Status**

☒ End of Month Report  
**Data through: 3/98 (unless otherwise noted)**  
☐ Shaded data through 2/98 (unless otherwise noted)

*Green, italicized, bolded data is corrected from previous edition.*

Date Produced: 5/1/98

#	CHECKLIST DESCRIPTION	PRODUCTS PROVIDED	AR	KS	MO	OK	TX	SWBT's 5 States	CA	NV	SBC TOTAL
	customers. (Note 3)										
10	Nondiscriminatory access to databases and associated signaling necessary for call routing and completion	Access to 800, Line Information Database (LIDB), Calling Name Delivery Database (CNAM), and SS7 Signaling Network Available?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
11	Interim number portability through RCF or DID trunks. Each line ported represents conversion of an existing line from SBC to a facilities-based provider	<b>Lines Converted via INP</b> Residential Lines Business Lines Total	0 1,268 1,268	0 580 580	0 958 958	0 9,292 9,292	37 14,813 14,850	37 26,911 26,948	Res/Bus Split Not Available 25,197	5,061	37 26,911 57,206
12	Nondiscriminatory access to services and information required to allow implementation of dialing parity.	Are additional access codes or digits needed to complete local calls to or from CLEC customers? IntraLATA toll dialing parity available concurrent with SBC's provision of interexchange service?	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes
13	Reciprocal compensation arrangements. (Note 4)	<b>Local and EAS Minutes of Use Exchanged Over Interconnection Trunks Since 1/1/97 (in Millions)</b> From SBC to CLEC From CLEC to SBC (CA - does not incl. Jan-98, NV - Pending) Total  <b>Local and EAS Minutes of Use Exchanged Over Interconnection Trunks in February 1998 (in Millions)</b> From SBC to CLEC From CLEC to SBC Total  <b>Local and EAS Minutes of Use Exchanged Over Interconnection Trunks in March 1998 (in Millions)</b> From SBC to CLEC From CLEC to SBC Total	22.4 6.6 29.0  3.5 0.0 3.5  2.1 0.0 2.1	0 0 0  0 0 0  0 0 0	29.6 0.0 29.6  4.9 0.0 4.9  6.5 0.0 6.5	114.1 10.8 124.9  11.1 2.7 13.8  13.6 2.4 16.0	212.7 133.9 346.6  24.3 30.8 55.1  16.1 0.0 16.1	378.8 151.3 530.1  44 33 77  38.4 2.4 40.8	2,881.0 401.1 3,282.1  84.2 60.3 144.5  9.7 56.2 65.9	10.4 0.0 10.4  2.7 <b>Not Available</b> 2.7  3.0 <b>Pending</b> 3.0	3,270.2 552.4 3,822.6  131 94 225  51.1 58.6 109.7
14	Offering for resale at wholesale prices any telecommunications services offered at retail to subscribers who are not themselves carriers.	<b>Resold Access Lines</b> Business Lines (Simple and Complex) Private Coin Lines Residential Lines Total	1,368 0 12,123 13,491	20,681 0 19,408 40,089	5,811 0 7,771 13,582	2,726 13 13,400 16,139	53,650 10,118 193,811 257,579	84,236 10,131 246,513 340,880	109,102 7,546 139,691 256,339	1,452 0 364 1,816	194,790 17,677 386,568 599,035

Note 1: CA and NV data updated quarterly. CA Total Feet of Duct Occupied reflects both IXC and CLEC facilities.

Note 2: SWBT total counts each CLEC once, although it may appear in multiple states and as both a facilities based and resale provider.

Note 3: Each NXX Code equals 10,000 telephone numbers.

Note 4: Totals do not include disputed Internet minutes of use. However, the fact that over 6.29B minutes of Internet traffic have been exchanged between SBC and CLEC networks in 1997 and 1998 also demonstrates that SBC's networks have been opened to competition. SWBT 1997 and 1998 totals include only Local and Optional EAS traffic. PB 1997 totals also include intraLATA toll.

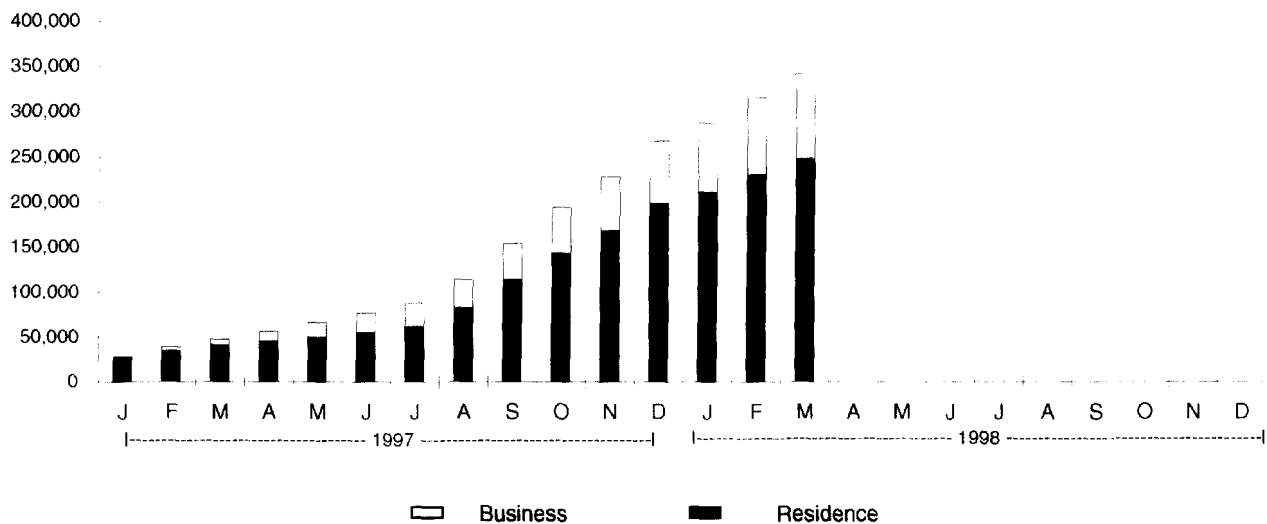
\* CA quantity reflects actual number of cages. By SWBT methodology, it would be 109 (counting CLECs in a given wire center only once).  
 \*\* CA Order Volumes include resale activity only (not facilities based orders)  
 \*\*\* KS does have OA/DA trunks. In process of splitting those OA/DA trunks terminating and counted in KC, MO that serve both KS and MO.  
 \*\*\*\* E-911 Data from MO reflects 2 residential listings (shown here as business), which do not appear to be residential end users.

CLECs with Certifications	AR	KS	MO	OK	TX	SWBT's 5 States	CA	NV	SBC TOTAL
Number Approved	17	43	36	34	156	286	116	52	454
Number Pending	27	12	18	17	22	96	33	8	137
<b>CLEC Interconnection Agreements</b>									
Number Signed	28	36	36	34	112	246	32	13	291
Number Approved	24	25	23	19	89	180	27	13	220
Number of Arbitrations Completed	1	3	3	1	11	19	4	0	23
Number of Arbitrations In Progress	1	0	0	0	1	2	0	1	3
Number Under Negotiation	55	52	61	58	131	357	35	23	415

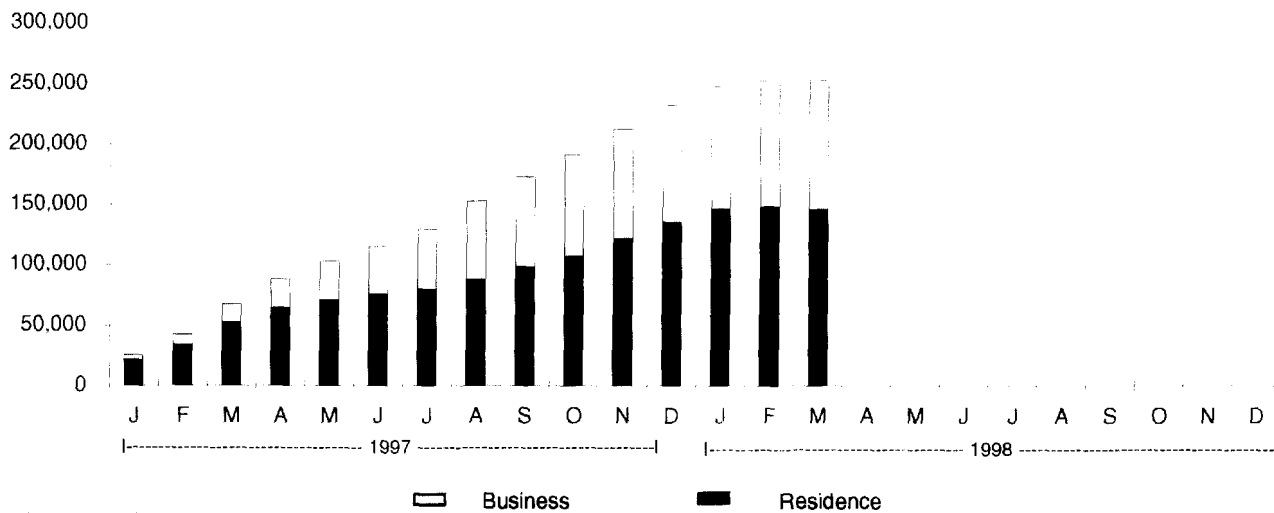


# SBC Resold Lines - Cumulative Resale Lines Lost to CLECs

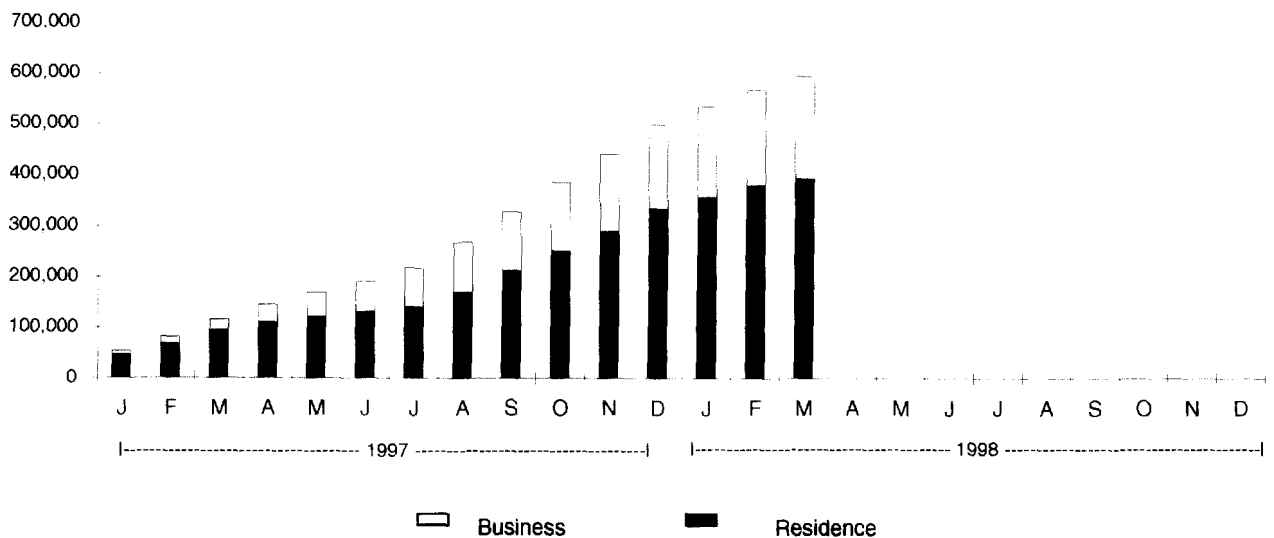
## Southwestern Bell Telephone



## Pacific Bell

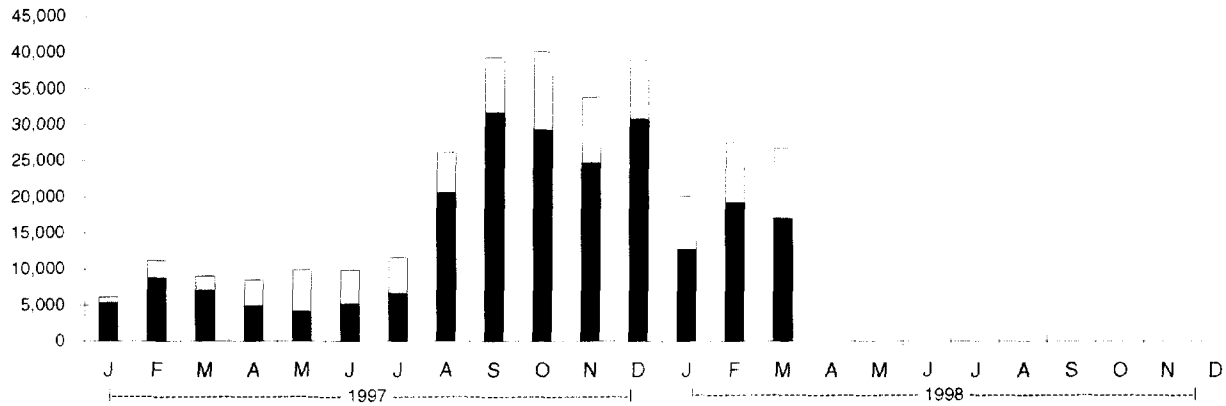


## SBC Consolidated



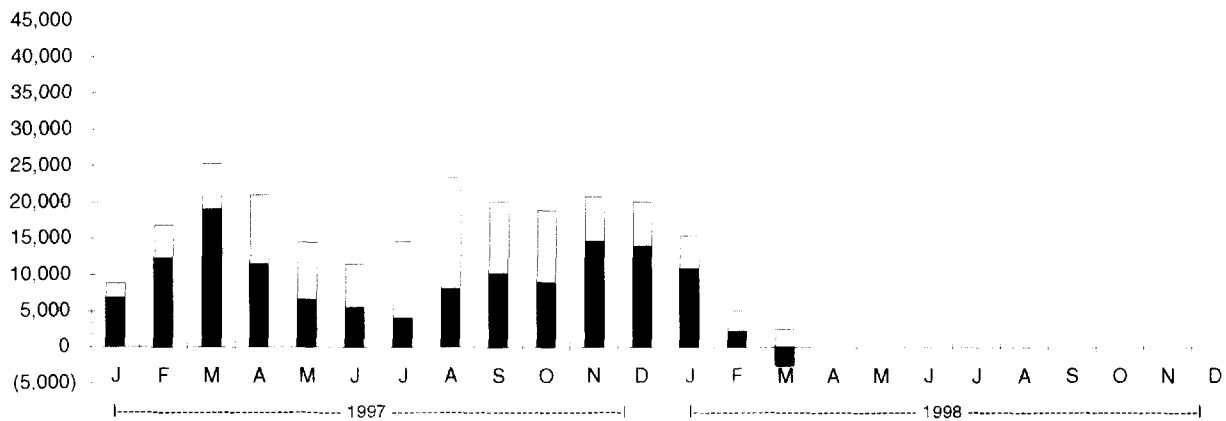
# SBC Resold Lines - Monthly Resale Lines Lost to CLECs

## Southwestern Bell Telephone



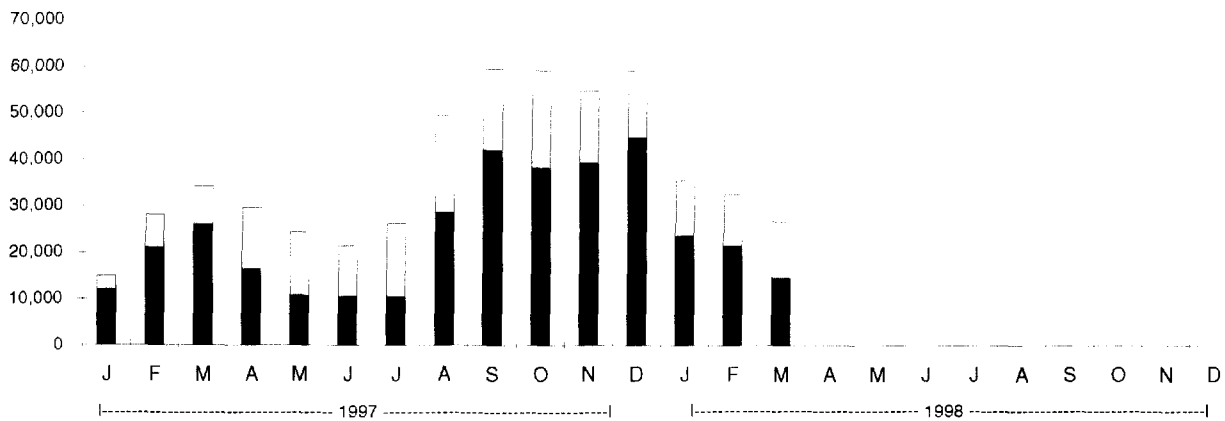
Business Residence

## Pacific Bell



Business Residence

## SBC Consolidated



Business Residence